

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT, NEW YORK
SEP 19 2011

Tamicka Graham,

BROOKLYN OFFICE

Plaintiff,

-vs.-

Rjm Acquisition LLC,

Defendant.

* CV 11 4682
* Cas. No. FEUERSTEIN, J
* TOMLINSON, M

COMPLAINT

I. Jurisdiction

1) Jurisdiction of this court is predicated under 28 U.S.C. 1331. This court has jurisdiction on Plaintiff's supplement claims pursuant to 28 U.S.C 1367(a)

II. PARTIES

2) Plaintiff Tamicka Graham is a natural person currently residing in the state of Florida, County of Pinellas, Plaintiff's address is 2420 8th St. South.

3) Defendant RJM Acquisition LLC is Plaintiff's creditor and does business in the State of Florida and New York. Defendant's corporate address is 575 Underhill Blvd STE 224.

III. VENUE

4) Venue is proper in the Eastern District of New York as the Defendant's Principal place of business. Further, the acts and transaction giving rise to this complaint occurred in the Eastern District of New York.

IV. STATEMENT OF CLAIM

5) Beginning in February 2010 Plaintiff notices error in which her accounts were being reported and the timeliness of Plaintiff's payments to the Credit Bureaus.

6) Beginning in April 2010 Plaintiff's initiated several disputes regarding her accounts by utilizing the dispute resolution services offered by both Experian challenging the manner in which his accounts were being reported.

7) Despite being aware of Plaintiff's bona fide disputes as to the timeliness of Plaintiff's payments, Dependent continued to report inaccuracies regarding Plaintiff's account.

8) Despite having been repeatedly notified of Plaintiff's bona fide dispute, Defendants refused to report to Experian that Plaintiff disputed said accounts in violation of U.S.C. 1681s-2(b)

Violation of Fair Credit Reporting Act and Fair Debt Collection Practices Act

9) Defendant's actions as described herein constitute violations of 15 U.S.C 1681s-2(b) as they received notice of dispute from Credit Reporting Agency (Experian) and failed to conduct an adequate and truthful investigation.

10) After receiving the dispute and reporting its alleged results, Defendant failed to report the fact that said dept was disputed in violation of 15 U.S.C. 1681s-2(b) and 15 U.S.C. 1692k as they willfully and with knowledge thereof of reported information it knew or should have known to be false in connection with Plaintiff's accounts.

11) Despite receiving numerous notices and disputes from the Plaintiff regarding the inaccuracies contained within the credit report, Defendant prepared and published to third parties, including potential lenders, multiple inaccurate consumer reports about the Plaintiff which contained false information.

12) Defendant's actions caused Plaintiff to suffer embarrassment, mental anxiety, emotional suffering, worry, humiliation, and mental distress.

LIBEL AND DEFAMATION

13) Defendant's published false information about Plaintiff's accounts, the false fact that Plaintiff's credit report was accessed, which was the result intended by the defendant.

14) This information was viewed repeatedly, each and every time the plaintiff's credit report was accessed, which was the result intended by the Defendant.

15) The publications were done maliciously, without privilege, and with intent to injure the Plaintiff.

16) As a consequence of Defendant's Actions, Plaintiff has suffered distress, loss of credit, and been chilled from seeking any additional credit and has suffered corresponding economic damages.

PRAYER FOR RELIEF

Wherefore, Plaintiff respectfully request that Judgment be entered against the Defendant for the following:

- a) Actual damages.
- b) Statutory damages.
- c) Cost and reasonable fees.
- d) Punitive damages.

e) For such other relief as the court may deem just and proper.

EXEXCUTED UNDER PENALTY OF PERJURY



Tamicka Graham
2420 8th St. South. Saint Petersburg FL 33705

DEMAND FOR JURY TRIAL

Please take note that Plaintiff demands trial by jury in this action.

Dated this 6th day of September, 2011.



Tamicka Graham
2420 8th St. South. Saint Petersburg FL 33705